



1919 Pennsylvania Ave. NW, Suite 725  
Washington, D.C. 20006  
Phone: 202-332-0500  
[www.mmtconline.org](http://www.mmtconline.org)

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September 5, 2018

Hon. Ajit Pai  
Chairman  
Hon. Jessica Rosenworcel  
Hon. Michael O’Rielly  
Hon. Brendan Carr  
Commissioners  
Federal Communications Commission  
445 12<sup>th</sup> St. S.W.  
Washington, D.C. 20554

Dear Mr. Chairman and Commissioners:

RE: Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment, **WT Docket No. 17-79**; and Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Deployment, **WT Docket No. 17-84**

The Multicultural Media Telecom and Internet Council (“MMTC”) supports the Commission’s efforts to move forward with its plans to issue an order in WT Dockets 17-79 and 17-84 by identifying and removing barriers to wireless and wireline broadband deployment. In doing so, MMTC urges the Commission to work toward removing unnecessary barriers in a way that supports the deployment of advanced broadband technologies by all providers investing in, testing and planning to deploy next generation wireless and wireline high-speed broadband networks.

With today’s growing convergence of wired and wireless services, it is more important than ever to facilitate the deployment of both wired and wireless infrastructure, which will help support broadband technologies such as Wi-Fi, Fixed Wireless, and 5G. To successfully deploy high-speed broadband networks to unserved and underserved communities across the country, multiple technologies will be needed. For this reason, we strongly encourage the Commission to update outdated regulations where possible, to the extent they disrupt efforts to connect all communities with advanced wireless and wireline broadband services.<sup>1</sup>

MMTC has previously supported the Commission’s plan to streamline the deployment review process by exempting small cells from certain reviews under the National Environmental Policy Act (NEPA) and

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<sup>1</sup> See Letter of MMTC *et al.*, Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment, WC Docket No. 17-84, available at <https://ecfsapi.fcc.gov/file/1061660439588/Final%20Joint%20Letter%20-%20Eugene%20OR%20ITFA%20061517.pdf> (last visited September 5, 2018) (“When the cost of broadband services increase, low-income individuals and families are the first to feel the financial burden. This in turn impacts adoption and the ability of families to participate in a digital economy. The Oregon law requires families to directly shoulder the cost of broadband.”)

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National Historic Preservation Act (NHPA), subject to coordination with tribal and state and local interests.<sup>2</sup>

According to a recent report by Accenture for CTIA,<sup>3</sup> 5G technologies and deployment will create nearly three million new jobs and generate \$275 billion in investment from the private sector. 5G technologies are expected to bring about major changes in people’s lives by supporting applications such as telehealth, which may not be possible with 4G. MMTC encourages the Commission to remove unnecessary barriers such as unreasonable delays, or fees that greatly exceed the norm, so that 5G deployment in rural areas and low-income urban areas can proceed expeditiously.

Notwithstanding MMTC’s support for 5G, we are concerned that millions of Americans, living in urban and rural areas, still have “no-G” and don’t receive any broadband coverage while neighboring communities do have coverage and at high-speed levels. MMTC encourages the FCC and industry to ensure that ALL communities have basic telephone service *and* basic broadband service, and that the regulatory process is not used for the primary purpose of streamlining deployment of 5G to the richest communities. Thus, it is also incumbent on the Commission to ensure that transformative new technologies, such as 5G small cell and high-speed wireline technologies, be deployed in a manner to avoid “digital redlining” in urban communities and small towns. Favoring wealthy urban and rural areas over others should be frowned upon. MMTC urges the Commission to encourage deployment of both wireless and wireline technologies throughout urban and rural communities regardless of economic status.

MMTC specifically encourages the Commission to observe the following principles as it applies its policies on broadband infrastructure:

- **Reduce barriers to deployment such as unreasonable taxes and fees and delays in issuing permits to help close the digital divide:** The Commission should take this opportunity to eliminate harmful regulatory barriers to high-speed broadband deployment. The promise of next-generation 5G wireless networks will be substantially delayed by costly and time-consuming local permitting of small cells if the Commission does not take action. Costly and burdensome regulatory requirements for wireless and wireline networks create substantial harm by impeding the delivery of advanced broadband services to unserved and underserved communities that need it most. The Commission should work toward eliminating deployment barriers for both wired and wireless technologies in an effort to bridge the digital divide in urban and rural areas and encourage rapid deployment of broadband.

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<sup>2</sup> See MMTC Press Statement on Small Cells, March 19, 2018, available at <http://www.mmtconline.org/wp-content/uploads/2018/03/MMTC-Press-Statement-Small-Cells-Regulatory-Streamlining-031918.pdf> (last visited September 5, 2018).

<sup>3</sup> See Accenture, Impact of Federal Regulatory Reviews on Small Cell Deployment, March 12, 2018, available at [https://api.ctia.org/docs/default-source/default-document-library/small-cell-deployment-regulatory-review-costs\\_3-12-2018.pdf](https://api.ctia.org/docs/default-source/default-document-library/small-cell-deployment-regulatory-review-costs_3-12-2018.pdf) (last visited September 5, 2018).

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- **Develop a consistent state and local government policy framework:** MMTC encourages the Commission to apply a consistent policy framework that balances the needs, opportunities, and impact on jobs, prioritizes the needs of underserved communities that do not yet have broadband access, and carefully balances state and local governments’ authority with the needed expansion of wireless and wireline broadband networks.

Keeping these considerations in mind, MMTC urges the Commission to issue an order in Dockets 17-79 and 17-84 to accelerate the availability of 5G and the next generation of advanced broadband to all consumers.

Respectfully submitted,

*Maurita Coley*

Maurita Coley Flippin  
President and CEO